

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JENNIFER VANDERSTOK, *et al.*,

Plaintiffs,

V.

**MERRICK GARLAND, in his official
capacity as Attorney General of the United
States, *et al.*,**

Defendants.

**Civil Action No.
4:22-cv-00691-O**

**NOT AN LLC D/B/A JSD SUPPLY'S AND POLYMER80, INC.'S UNOPPOSED
JOINT MOTION TO STAY RULE 54 DEADLINE**

Not An LLC d/b/a JSD Supply (“JSD”) and Polymer80, Inc. (“Polymer80”), both intervenor–plaintiffs in the above-captioned case, respectfully move the Court to stay the deadline set forth in Federal Rule of Civil Procedure 54 for prevailing parties to move for costs and attorneys’ fees. The other parties to this action do not oppose this motion.

The Court entered Final Judgment as for claims challenging the Final Rule, *see* 87 Fed. Reg. 24,652 (Apr. 26, 2022), on July 5, 2023. (ECF No. 231). Defendants have appealed the Court’s summary-judgment order and final judgment, (ECF Nos. 227, 231, 234), which likely will affect the substance of JSD’s and Polymer80’s motions for costs and attorneys’ fees. This Court has already granted a materially indistinguishable motion filed by the original plaintiffs. (*See* ECF Nos. 235, 237). JSD and Polymer80 respectfully seek the same relief.

* * *

For the reasons above, JSD and Polymer80 request that the Court stay their Rule 54 deadline to file motions for costs and attorneys' fees until 14 days following final resolution of

Defendants' appeal of the Court's Opinion and Order (ECF No. 227) and Final Judgment (ECF No. 231).

Dated July 18, 2023

/s/ J. Mark Brewer

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Respectfully submitted,

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Counsel for Polymer80, Inc.

CERTIFICATE OF CONFERENCE

I certify that on July 18, 2023, I conferred with counsel for each of the plaintiffs and counsel for the defendants regarding this motion. Counsel for each of the plaintiffs and counsel for the defendants informed the undersigned that this motion is unopposed.

/s/ Dennis L. Daniels Jr.

Dennis L. Daniels Jr.

CERTIFICATE OF SERVICE

I certify that on July 18, 2023, the foregoing document was served, via the Court's CM/ECF Document Filing System, upon the registered CM/ECF users in this action.

/s/ *Dennis L. Daniels Jr.*

Dennis L. Daniels Jr.